

*Attorneys for Defendants*  
*LEADPILE LLC and CREDIT PAYMENT SERVICES, INC.*

FLEMMING KRISTENSEN, individually,  
and on behalf of a class of similarly situated  
individuals,

Plaintiff,

V.

CREDIT PAYMENT SERVICES, INC.,  
a Nevada corporation,  
f/k/a MYCASHNOW.COM INC.,  
ENOVA INTERNATIONAL, INC.,  
an Illinois corporation,  
PIONEER FINANCIAL SERVICES, INC.,  
a Missouri corporation,  
LEADPILE LLC,  
a Delaware limited liability company, and  
CLICKMEDIA, LLC d/b/a  
NET1PROMOTIONS LLC, a Georgia limited  
liability company,

Defendants.

Case No. 2:12-CV-00528-APG (PAL)

DEFENDANT LEADPILE LLC'S  
MOTION TO FILE A SUPPLEMENTAL  
BRIEF IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT

1 Defendant LeadPile LLC. ("LeadPile") by and through its attorneys Sideman & Bancroft  
2 LLP ("Sideman"), hereby move this Court for leave to file a supplemental brief in support of  
3 LeadPile's Motion for Summary Judgment ("Motion") filed on October 24, 2014. LeadPile's  
4 previous counsel, who filed the Motion, was replaced as counsel on February 5, 2015. LeadPile's  
5 current counsel, requires additional time to review the briefing by prior counsel and opposing  
6 counsel and to submit supplemental briefing on behalf of LeadPile in support of the Motion.

7 WHEREFORE, for the foregoing reasons, Defendant respectfully requests that this Court  
8 grant LeadPile leave to file a Supplemental Brief in Support of LeadPile's Motion for Summary  
9 Judgment by no later than thirty days from entry of an Order granting this Motion. This will not  
10 prejudice the Plaintiff as the Court has yet to rule on the pending Motion for Summary Judgment.  
11 Also, there are no deadlines which will be impacted by the Court granting this request.

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13  
14 DATED: February 18, 2015

HUTCHINSON & STEFFEN

15  
16 By: /s/ Patricia Lee

17 Patricia Lee  
18 Attorneys for Defendant LEADPILE LLC  
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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR  
LEAVE TO FILE A SUPPLEMENTAL BRIEF IN SUPPORT OF LEADPILE'S MOTION  
FOR SUMMARY JUDGMENT**

**I. INTRODUCTION**

On October 24, 2014, LeadPile filed its Motion for Summary Judgment in the instant action. The motion was briefed by both parties. LeadPile's previous counsel withdrew from this case on February 5, 2015. The deadline for the Parties to file all dispositive motions (including motions for summary judgment) was set for October 24, 2014. Plaintiff was granted leave to file its Motion for Summary Judgment no later than three weeks from January 6, 2015. LeadPile's current counsel, needs additional time to review the briefing by prior counsel and opposing counsel and to submit supplemental briefing on behalf of LeadPile if deemed helpful to the Court's consideration of the pending Summary Judgment Motion.

**II. ARGUMENT**

LeadPile's new counsel requires additional time to review the previously filed briefs so it can determine whether supplemental briefing would assist the court in reaching an equitable ruling, and, if so, to draft and file a supplemental brief. This requested leave will not prejudice the Plaintiff as the Court has yet to rule on the pending Motion for Summary Judgment. Also, there are no deadlines which will be impacted by the Court granting this request.

**III. CONCLUSION**

For the reasons set forth above, LeadPile's request for leave to file a supplemental brief should be granted by this Court.

DATED: February 18, 2015

HUTCHINSON & STEFFEN

By: /s/ Patricia Lee

Patricia Lee

Attorneys for Defendant LEADPILE LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2015, a true and correct copy of DEFENDANT LEADPILE LLC'S MOTION TO FILE A SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT was filed electronically with the clerk of the Court using the CM/ECF system. Notice of this filing will be sent by the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

DATED: February 18, 2015

HUTCHINSON & STEFFEN

By: /s/ Patricia Lee

Patricia Lee

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*LEADPILE LLC*

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*Attorneys for Defendants*

*LEADPILE LLC and CREDIT PAYMENT SERVICES, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

FLEMMING KRISTENSEN, individually,  
 and on behalf of a class of similarly situated  
 individuals,

Plaintiff,

v.

CREDIT PAYMENT SERVICES, INC.,  
 a Nevada corporation,  
 f/k/a MYCASHNOW.COM INC.,  
 ENOVA INTERNATIONAL, INC.,  
 an Illinois corporation,  
 PIONEER FINANCIAL SERVICES, INC.,  
 a Missouri corporation,  
 LEADPILE LLC,  
 a Delaware limited liability company, and  
 CLICKMEDIA, LLC d/b/a  
 NET1PROMOTIONS LLC, a Georgia limited  
 liability company,

Defendants.

) Case No. 2:12-CV-00528-APG (PAL)  
 )  
 ) ORDER GRANTING DEFENDANT  
 ) LEADPILE LLC'S MOTION FOR  
 ) LEAVE TO FILE SUPPLEMENTAL  
 ) BRIEFING IN SUPPORT OF MOTION  
 ) FOR SUMMARY JUDGMENT

1           After due consideration of Defendant LEADPILE LLC's ("LeadPile") Motion for Leave to  
2 File Supplemental Briefing in Support of Its Motions for Summary Judgment, it is hereby ordered  
3 that:

4           1. Defendant LeadPile has until \_\_\_\_\_ to file any supplemental  
5 briefing.

6  
7 DATED: \_\_\_\_\_, 2015

By: \_\_\_\_\_  
United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2015, a true and correct copy of ORDER GRANTING DEFENDANT LEADPILE LLC'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEFING IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT was filed electronically with the clerk of the Court using the CM/ECF system. Notice of this filing will be sent by the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

DATED: February 18, 2015

HUTCHINSON & STEFFEN

By: /s/ Patricia Lee  
Patricia Lee  
*Attorneys for Defendants*  
*LEADPILE LLC*